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19 *Attorneys for Defendant Troy Newman*

20 **UNITED STATES DISTRICT COURT**  
21 **NORTHERN DISTRICT OF CALIFORNIA**

22 PLANNED PARENTHOOD FEDERATION OF  
23 AMERICA, INC., *et al.*,

24 Plaintiffs,

25 vs.

26 THE CENTER FOR MEDICAL PROGRESS, *et*  
27 *al.*,

28 Defendants.

) Case No. 3:16-CV-00236 (WHO)

)

) Judge William H. Orrick, III

)

)

) **STIPULATION UNDER FEDERAL RULE OF**  
) **APPELLATE PROCEDURE 10(E)(2)(A) RE:**  
) **TRANSCRIPTS OF VIDEO-TAPED**  
) **TESTIMONY. [PROPOSED] ORDER**

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29 Pursuant to Fed. R. App. Proc. 10(e)(2)(A), the Defendants and Plaintiffs stipulate and move  
30 the Court to supplement the record with transcripts of the witnesses who testified via videotaped  
31 deposition pursuant to Fed. R. Civ. P. 32.

1 The stipulated transcripts have been reviewed by Counsel for both parties. They are marked  
2 and attached in the order below.

3 Attachment	Witness Name	Date	Testimony Admitted
4			
5 A.	Nichelle Davis,	Oct 11	Vol 6, pg 1174,
6 B.	Deborah VanDerHei,	Oct. 16,	Vol. 8, pg 1561,
7 C.	Melissa Farrell,	Oct 17,	Vol. 9, pg 1697,
8 D.	Tram Nguyen,	Oct. 17	Vol. 9, , pg 1726,
9		Oct. 18,	Vol. 10, pg 1926,
10		Nov. 6,	Vol. 17, pg 3394,
11 E.	Phillip Cronin,	Oct. 31,	Vol. 14, pg 2748,
12 F.	Greg Mueller,	Nov. 6,	Vol. 17, pg 3262,
13 G.	Kathleen Bryan,	Nov. 6,	Vol. 17, pg 3394.

14  
15 NOW THEREFORE, IT IS HEREBY MOVED by the Parties, through the undersigned  
16 Counsel, that:

17 1. They stipulate that the transcripts listed above and attached are of the Fed. R. Civ. P.  
18 32 videotaped testimony designated by the Parties and shown to the jury on the dates referenced  
19 above should be entered into the Docket.

20  
21 2. The Court enter the attached Order granting the stipulation.

22 Respectfully submitted on August 27, 2020

23  
24 /s/ John A. Monaghan  
25 Edward L. White III, pro hac vice  
26 Erik M. Zimmerman, pro hac vice  
27 John A. Monaghan, pro hac vice  
28 Christina A. Stierhoff, pro hac vice  
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By: /s/ Rhonda R. Trotter

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By: /s/ John A Monaghan  
Counsel for Plaintiffs

1 **[PROPOSED] ORDER**

2 PURSUANT TO STIPULATION,

3  
4 Pursuant to Fed. R. App. Proc. 10(e)(2)(A), the Defendants and Plaintiffs stipulate that the  
5 transcripts of the witnesses listed below are of the Fed. R. Civ. P. 32 videotaped testimony designated  
6 by the Parties and shown to the jury on the dates referenced below:

7 Attachment	Witness Name	Date	Testimony Admitted
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17 G.	Kathleen Bryan,	Nov. 6,	Vol. 17, pg 3394.

18  
19 NOW THEREFORE, the Defendants and Plaintiffs stipulation is hereby granted and the  
20 transcripts listed above are entered into the Docket.

21  
22 IT IS SO ORDERED.

23  
24  
25 Dated: \_\_\_\_\_, 2020

26 \_\_\_\_\_  
27 Hon. William H. Orrick  
28 United States District Judge